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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Bentley D. Price

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Appellate Case No. 2021-000100  
Common Pleas Case No. 2019-CP-10-06058

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Bay Light, LLC,.....Respondent,

v.

Westgate Office Park Landowner Maintenance Association, Inc., .....Appellant.

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NOTICE OF WITHDRAWAL AND SUBSTITUTION OF COUNSEL

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NOW COMES G. Thomas Hill of Hill & Hill LLC and gives notice of his appearance as counsel for Respondent in the above-referenced action. Mr. Hill appears in place of John A. Massalon of Wills Massalon & Allen LLC, who hereby formally withdraws as counsel for Respondent, as evidenced by his consent below. Mr. Hill hereby requests that all pleadings, motions, notices, correspondence and other papers relating to the above-captioned action be sent to Hill & Hill LLC at the address listed below.

This 16th day of February, 2021.

WE SO MOVE:

s/ G. Thomas Hill

G. Thomas Hill, Esquire (SC Bar #12055)

HILL & HILL, LLC

6209 Savannah Highway

Ravenel, South Carolina 29470

843-889-2262

hillpdq1@gmail.com

WE SO CONSENT:

s/ John A. Massalon

John A. Massalon (SC Bar #10279)

WILLS MASSALON & ALLEN LLC

Post Office Box 859

Charleston, South Carolina 29402

843-727-1144

jmassalon@wmalawfirm.net

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Bay Light, LLC, ..... Respondent,

v.

Westgate Office Park Landowner's Maintenance Association, Inc., ..... Appellant.

**PROOF OF SERVICE**

I certify that I have served the Notice of Withdrawal and Substitution of Counsel by depositing a copy of it in the United States Mail postage prepaid, on February 16, 2021 addressed to:

Dr. Terri Southard  
Bay Light, LLC  
1925 Savannah Hwy  
Charleston, South Carolina 29407

**RESPONDENT**

G. Thomas Hill, Esquire  
HILL & HILL, LLC  
6209 Savannah Highway  
Ravenel, South Carolina 29470  
843-889-2262  
[hillpdq1@gmail.com](mailto:hillpdq1@gmail.com)

Erika V. Harrison, Esquire  
Law Offices of Erika V. Harrison  
P.O. Box 20956  
Charleston, South Carolina 29413  
(843) 302-1900  
[erika@erikaharrison.com](mailto:erika@erikaharrison.com)

**ATTORNEY FOR APPELLANT**

s/John A. Massalon

John A. Massalon, Esquire (SC Bar #10279)

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(843) 727-1144

[jmassalon@wmalawfirm.net](mailto:jmassalon@wmalawfirm.net)

February 16, 2021

Charleston, SC

# WMA

WILLS MASSALON & ALLEN LLC

97 Broad Street • Charleston, SC 29401 • Post Office Box 859 • Charleston, SC 29405  
Phone: 843-727-1144 • Fax: 843-727-7696 • www.wmalawfirm.net

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SC Court of Appeals

February 16, 2021

Direct Dial: (843) 793-6039

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: Bay Light, LLC v. Westgate Office Park Landowners Maintenance Association, Inc.

Appellate Case No.: 2021-000100

Our File No.: 2267-1

Dear Ms. Kitchings:

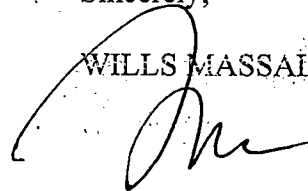
Enclosed please find the original and one (1) copy of a Notice of Withdrawal and Substitution of Counsel and Proof of Service in regard to the above-reference matter. In addition, please find my firm's check #11146 in the amount of \$50.00 representing the filing fee. Please file the original, file-stamp the copy, and return the file-stamped copy to me in the self-addressed, stamped envelope provided.

By copy of this correspondence, I am serving the same upon counsel for Appellant and Respondent. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC



John A. Massalon

[jmassalon@wmalawfirm.net](mailto:jmassalon@wmalawfirm.net)

JAM/mt  
Enclosures

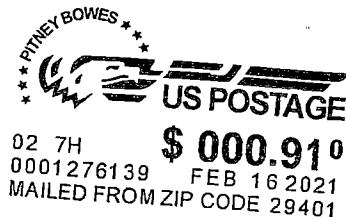
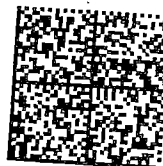
cc: Dr. Terri Southard (via e-mail and U.S. mail)  
Erika V. Harrison, Esquire  
G. Thomas Hill, Esquire

# WMA

WILLS MASSALON & ALLEN LLC

Post Office Box 859  
Charleston, SC 29402

FIRST-CLASS



The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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**SC Court of Appeals**

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